

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

UNITED STATES OF AMERICA,

vs:

ANDREA NICOLE STICKEL

Defendant

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Case #: 1:18 CR00025-005

RESPONSE TO GOVERNMENT’S RULE 35(b) MOTION

COMES NOW the Defendant, Andrea Nicole Stickel, by counsel and files this Response to the Motion pursuant to Federal Rule of Criminal Procedure 35(b) filed by the government for reduction of the defendant’s sentence as follows:

The defendant appreciates and embraces the Motion filed by the government to recognize her substantial assistance to the government. The memorandum filed by the government accurately sets forth the assistance Andrea Nicole Stickel did give the government. We do emphasize the timeliness of her cooperation. She met with investigative authorities in September of 2018 prior to her indictment in this Court. She was a great assistance to authorities in Tennessee and Virginia and in fact testified before the Grand Jury of this Court.

We understand the Court will also consider all other relevant sentencing factors. Rather than merely restate arguments previously made on her behalf, I would refer the Court to our sentencing memorandum and addendum to the sentencing memorandum previously filed herein. We would however emphasize Andrea’s personal history and the “living hell” in which she was raised.

Further, as previously argued, Andrea’s criminal history as calculated by the guidelines, overstates the true nature and seriousness of her relatively minor criminal past. The details are fully set forth in her pre-sentence report and her sentencing memorandum. We asked the Court to consider all these matters in determining an appropriate reduction in sentence.

ANDREA NICOLE STICKEL

BY COUNSEL

BY:

/s/ Gregory M. Stewart
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CERTIFICATE

I hereby certify that I have electronically filed the Defendant's Response to the Government's Rule 35(b) Motion with the Clerk of the Court using the CM/ECF system which will send notification of such filings and send a copy of such filing to the Assistance United States Attorney for the Western District of Virginia, or other prosecutor, who is responsible for the handling of this case on this the 15 day of April, 2020.

/s/ Gregory M. Stewart
COUNSEL FOR DEFENDANT